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August 20, 2014

Via ECF and Email

Bankruptcy Judge Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
Court Room 723
New York, NY 10004-1468

Re: Fairfield Sentry Limited (In Liquidation) v. ABN Amro Schweiz AG et al., 10 Adv. Pro. No. 03635 (SMB)

Dear Bankruptcy Judge Bernstein:

This firm represents the defendants BBH Lux Guardian II a/k/a Brown Brothers Harriman, BBH Lux Ref Fairfield GRN, Harmony Capital Fund Ltd., Lloyds TSB Bank Geneva, and RBS Coutts Bank Ltd. in the above-referenced adversary proceedings. I am writing to report on the issues raised by Your Honor during a conference on July 23, 2014 regarding the fact – then unknown to me – that my firm hired your son as an associate in our corporate department in March 2014. In that regard, this is to advise that my firm has installed comprehensive conflict walls and other protections to prevent your son from having any access to the Madoff and Fairfield matters my firm is handling. Your son has not had and will not have any role with respect to these matters nor have we communicated with him about these matters other than to set up the protective walls we have put in place.

Based upon these and more detailed representations about the walls, counsel for the Plaintiff in the above-referenced proceeding has agreed that the Plaintiff will not object to Katten's continued representation of its client in this case or seek to recuse you from presiding over it. In addition, I have fully disclosed the events above to all of my firm's clients having matters before Your Honor. None have raised any objection to our continued representation.

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Please feel free to contact me if the Court needs any further information.

Very truly yours,



Anthony L. Paccione